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VIA ECF

Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Foxworth v. Gagliardi, et al.,
19-CV-1956 (WFK) (LB)

Your Honor:

I represent defendants the City of New York, Michael McCready, John Vitale, Jason Levy, Thomas Gagliardi, Brian Ritto, and Craig Rosenberg in the above-referenced matter. Defendants write to respectfully request that the Court endorse the Stipulation of Confidentiality and Protective Order attached hereto as Exhibit A.

The Court issued a scheduling Order on August 7, 2020, which, *inter alia*, directed the parties to file a protective order by October 2, 2020. Accordingly, the parties have agreed to the terms of the attached Stipulation of Confidentiality and Protective Order to govern the disclosure of documents and information in this matter, and which has been executed by the parties. That stipulation is attached hereto. Defendants respectfully request that the Court endorse the attached stipulation and protective order.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Zachary Kalmbach
Zachary Kalmbach
Assistant Corporation Counsel
Special Federal Litigation Division

Encl.

CC: **Via ECF**
Martin Ellis Adams
Attorney for plaintiff